

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE TREMONT SECURITIES LAW, STATE :	Master File No.
LAW AND INSURANCE LITIGATION :	No. 08 CV 11117 (TPG)
:	
:	ECF CASE
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**MEMORANDUM OF SOLA LTD ET AL.
IN OPPOSITION TO THE MARTIN MOTION**

SOLA Ltd, Solus Core Opportunities Master Fund Ltd, Solus Recovery Fund II Master LP, Solus Recovery LH Fund LP, Ultra Master Ltd, Halcyon Loan Trading Fund LLC, and BMIS Funding I, LLC (collectively, the “Undersigned Investors”) respectfully submit this Memorandum in opposition to Michael S. Martin’s motion [ECF No. 1093] for, among other things, approval of his own Plan of Allocation for the Fund Distribution Account.

The Undersigned Investors, all class members and Fund Distribution Claimants (as defined in the Stipulation of Partial Settlement [ECF No. 392-1]) that invested in Rye Select Broad Market Fund, L.P. (“Rye Onshore”), hereby adopt and join in the arguments set forth in the memoranda submitted by HSBC Bank plc, SPCP Group, LLC, Royal Bank of Scotland, N.V., and Dolos X LLC, Dolos XI LLC, and Dolos XII LLC in opposition to Martin’s motion.

Dated: New York, New York
July 30, 2015

Respectfully submitted,

WILLKIE, FARR & GALLAGHER LLP

MILBANK, TWEED, HADLEY & McCLOY LLP

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By: /s/ Daniel M. Perry

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